

RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
RICK MULA
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Rick.Mula@fd.org

Attorney for Lee Jacob Baldon, Jr.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

LEE JACOB BALDON, JR.,

Defendant.

Case No. 2:20-cr-00346-GMN-EJY

**STIPULATION TO CONTINUE
MOTION DEADLINES**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Melinda Brewer, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula, Assistant Federal Public Defender, counsel for Lee Jacob Baldon, Jr., that parties herein shall have to and including April 10, 2025, to file any and all pretrial motions and notices of defense.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including April 24, 2025, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including May 1, 2025, to file any and all replies to dispositive motions.

The Stipulation is entered into for the following reasons:

¹. The current pretrial motions deadline is March 27, 2025. (ECF No. 54 at 5.)

1 2. Counsel for Mr. Baldon has scheduled an in-person visit with him on March 28,
2 2025. Counsel for Mr. Baldon wishes to consult with Mr. Baldon again before filing any pretrial
3 motion, necessitating a brief extension of the pretrial motions deadline. Counsel for Mr. Baldon
4 respectfully suggests that it is unnecessary to move the trial date because the requested
5 extension is short. LCR 45-2(b).

6 3. Mr. Baldon is incarcerated and agrees with the need for the continuance.

7 4. The parties agree to the continuance.

8 5. The additional time requested herein is not sought for purposes of delay.

9 6. Additionally, denial of this request for continuance could result in a miscarriage
10 of justice. The additional time requested by this Stipulation is excludable in computing the time
11 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
12 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
13 Section 3161(h)(7)(B)(i), (iv).

14 This is the fifth stipulation to continue filed herein.

15 DATED this 17th day of March, 2024.

16 RENE L. VALLADARES
17 Federal Public Defender

18 By /s/ Rick Mula

19 RICK MULA
Assistant Federal Public Defender

SUE FAHAMI
Acting United States Attorney

By /s/ Melinda Brewer

MELINDA BREWER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
LEE JACOB BALDON, JR.,
Defendant.

Case No. 2:20-cr-00346-GMN-EJY

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The current pretrial motions deadline is March 27, 2025. (ECF No. 54 at 5.)
2. Counsel for Mr. Baldon has scheduled an in-person visit with him on March 28, 2025. Counsel for Mr. Baldon wishes to consult with Mr. Baldon again before filing any pretrial motion, necessitating a brief extension of the pretrial motions deadline. Counsel for Mr. Baldon respectfully suggests that it is unnecessary to move the trial date because the requested extension is short. LCR 45-2(b).

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section § 3161(h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including April 10, 2025 to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including April 24, 2025 to file any and all responses.

IT IS FURTHER ORDERED that the parties shall have to and including May 1, 2025 to file any and all replies.

DATED this 18th day of March, 2025.

Elynn J. Zouchal
UNITED STATES MAGISTRATE JUDGE